

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NEW YORK**

ASHRAF IBRAHIM, individually and on
behalf of all others similarly situated,

Plaintiff,

v.

AMERICAN HONDA MOTOR CO.,
INC.,

Defendant.

Case No. 1:19-CV-04916-KAM-JO

**DEFENDANT AMERICAN HONDA
MOTOR CO.'S NOTICE OF MOTION
TO DISMISS PLAINTIFF'S SECOND
AMENDED COMPLAINT**

PLEASE TAKE NOTICE that, upon the accompanying memorandum of law, Declaration of Joshua Matthews, Declaration of Justin T. Goodwin, and exhibits thereto, Defendant American Honda Motor Co., Inc. will move this Court, before the Honorable Kiyo A. Matsumoto, United States District Judge, at a date and time set by the Court, for an Order dismissing the Second Amended Complaint pursuant to Rules 12(b)(1) and 12(b)(6) of the Federal Rules of Civil Procedure.

Dated: January 24, 2020

Respectfully submitted,

By: /s/Justin T. Goodwin
Justin T. Goodwin

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